

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RICHARD J. CAPAK,

Plaintiff,

-against-

TAUHEED EPPS a/k/a 2 CHAINZ
and RORY DORALL SMITH,

Defendants.

Civil Action No.: 1:18-cv-04325


**DECLARATION
OF KAROL RUSSELL**

I, KAROL RUSSELL, have personal knowledge of the facts stated herein and hereby certify and declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the business manager of Street Execs Management, LLC (“Street Execs”).
2. Street Execs provides artist management services for Tauheed Epps, p/k/a 2 Chainz (“Mr. Epps”), a defendant in the above-referenced action, and has done so for approximately the past ten years.
3. For approximately the past ten years, Mr. Epps has occasionally retained defendant Rory Dorall Smith (“Mr. Smith”) as an independent contractor to provide Mr. Epps with security services for specific occasions.
4. Street Execs does not employ Mr. Smith, and has never employed Mr. Smith. Mr. Smith does not act as an independent contractor for Street Execs, and has never done so.
5. Street Execs does not issue payment or tax forms to Mr. Smith, or to any other individuals who provide security services for Mr. Epps.
6. Street Execs does not provide health insurance to Mr. Smith, or to any other individuals who provide security services for Mr. Epps.

7. Street Execs was not involved in any manner with the alleged incident on October 27, 2017, where Plaintiff was allegedly struck by Mr. Smith and allegedly suffered injuries.

Dated: January 22, 2020



KAROL RUSSELL